

AUSAs: Ryan W. Allison, Justin L. Brooke, Jennifer N. Ong, and Margaret N. Vasu

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KALIF COX,

Defendant.

25 my 578

COMPLAINT

Violations of 18 U.S.C. §§ 924(c) and 933

COUNTIES OF OFFENSES:
BRONX, ORANGE

SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS L. ANDERSON, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation (the "FBI"), and charges as follows:

COUNT ONE
(Firearms Trafficking Conspiracy)

1. From at least in or about March 2024 through at least in or about July 2024, in the Southern District of New York and elsewhere, KALIF COX, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States, to wit, violations of Title 18, United States Code, Sections 933(a)(1) and (a)(2).

2. It was a part and an object of the conspiracy that KALIF COX, the defendant, and others known and unknown, would and did ship, transport, transfer, and cause to be transported, and otherwise dispose of a firearm to another person in and otherwise affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

3. It was further a part and an object of the conspiracy that KALIF COX, the defendant, and others known and unknown, would and did receive from another person a firearm in and otherwise affecting interstate or foreign commerce, knowing and having reasonable cause to believe that such receipt would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(2).

(Title 18, United States Code, Section 933.)

COUNT TWO
(Firearms Use, Carrying, and Possession)

4. On or about July 8, 2024, in the Southern District of New York and elsewhere, KALIF COX, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code,

Sections 846 and 841(a)(1), knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, which was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

5. I am a Special Agent with the FBI. I have been a Special Agent with the FBI since 2017. Prior to joining the FBI, I served as a detective with the Prince George's County Police Department in Maryland. Over the course of my career, I have participated in numerous investigations of racketeering conspiracies, narcotics conspiracies, violent crime, and unlawful firearms distribution. During the course of these investigations, I have conducted or participated in surveillance, undercover transactions, the introduction of undercover agents, the execution of search warrants, debriefings of informants, reviews of taped conversations and drug records, and have participated in investigations that included the interception of wire and electronic communications. Through my training, education and experience, I have become familiar with the manner in which illegal firearms are transported, stored, and distributed.

6. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with other law enforcement officers, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

7. As explained below, the FBI is investigating, among other things, a conspiracy to traffic firearms from North Carolina to New York in furtherance of gang- and drug-related illegal activity. During this investigation, and as described in substance and in part and in further detail below, members of law enforcement uncovered evidence of participation by KALIF COX, the defendant, in such a firearms trafficking conspiracy and evidence that, on or about July 8, 2024, COX committed a non-fatal drug distribution-related shooting in the Bronx and used one of the firearms trafficked in the conspiracy to do so.

The Firearms Trafficking Conspiracy


8. Based upon my review of law enforcement reports and records and communications with other members of law enforcement, including from the NYPD, I know that, on or about July 10, 2024, members of the New York City Police Department (the "NYPD") interacted with a van (the "Van") in the vicinity of White Plains Road and Allerton Avenue in the Bronx. The Van was occupied by three individuals, including KALIF COX, the defendant. In the van, the NYPD found a loaded .32 caliber handgun (the ".32 Handgun"). Members of the NYPD then arrested COX and the other occupants of the car.


9. I have reviewed a report prepared by the New York City Office of Chief Medical Examiner that indicates that DNA obtained from KALIF COX, the defendant, matches DNA collected from the .32 Handgun, indicating that COX has personally handled that firearm.

10. After placing COX under arrest on July 10, 2024, members of the NYPD seized two cellphones from COX ("COX's Cellphones"). Members of law enforcement later searched COX's Cellphones pursuant to a search warrant for evidence of, among other things, unlawful use or possession of firearms.

11. The search of COX's Cellphones revealed conversations between COX and a co-conspirator ("CC-1") that evidence a conspiracy to traffic firearms, including the .32 Handgun, from North Carolina to the Bronx and elsewhere to be used in furtherance of gang- and drug-related shootings:

a. On or about March 29, 2024, COX and CC-1 discussed an illegal firearms sale via Telegram:


Approximate Time	COX	CC-1
4:49 p.m.	Wya [<i>i.e.</i> , where you at]	
4:55 p.m.		In queens at bro brib rn [<i>i.e.</i> , right now]
5:02 p.m.		
	I'm bout to see what scar doing rn n****s need that tho	
		Ait n need like 600 for it ...
	600?	
	You said 4 bills wok	
		Dat how much I paid need at least 5 bak wok [<i>i.e.</i> , a nickname used to refer to fellow gang members]
5:11 p.m.	Ii let me talk to the woks	
		Kopy


...		
5:39 p.m.	1633 Macombs Road	
	Bronx Ny	
6:21 p.m.		Saydat ...
		Jus had misfire
6:24 p.m.	With the 38 [<i>i.e.</i> , a type of firearm]?	
6:39 p.m.		Type
...		
		 <p>[this appears to be an image of a television screen with an accidental bullet hole]</p>
...		
7:51 p.m.		Dropped Bro n jakkie [<i>i.e.</i> , firearm] off lmk [<i>i.e.</i> , let me know] still want me to slide wok

b. On or about April 7, 2024, COX and CC-1 discussed another illegal firearms transaction via Telegram:


Approximate Time	COX	CC-1
6:35 p.m.	How much the Jackie's [<i>i.e.</i> , firearms] again wit button [<i>i.e.</i> , a firearm accessory]	
6:59 p.m.		He said it a arp [<i>i.e.</i> , a type of firearm] he talkin bout he need a bag for it
7:02 p.m.		Said he jus sold one for 12
7:17 p.m.	Aight bet	

c. On or about April 21, April 22, and April 30, 2024, COX and CC-1 had further conversations via Telegram about firearms trafficking and their intent to provide those firearms to others for the purpose of committing gang-related gun crimes. Specifically, in this exchange, CC-1 appears to have offered to acquire the .32 Handgun on COX's behalf:

Approximate Time	COX	CC-1
April 21, 2024		
11:40 p.m.		 <p>[sends a video displaying the .32 caliber firearm pictured above, which appears, based on the firearm's distinctive markings and on my training and experience, to be consistent with the .32 Handgun recovered by the NYPD from the Van when COX was arrested on or about July 10, 2024]</p>
		Wit bro rn [<i>i.e.</i> , right now] want me to grab this ?

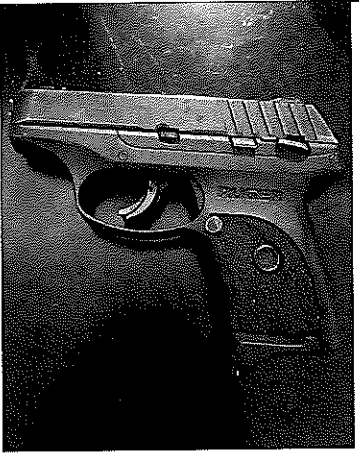
		Got the botton [<i>i.e.</i> , button, a firearm accessory]
		On inside bro said
...		
April 22, 2024		
3:21 a.m.	My service horrible	
	Can't see	
3:59 a.m.	What kind of pole [<i>i.e.</i> , firearm] was it.	
4:08 a.m.		 <p>Davis P-32 Pistol Review: 'It's a good clunky' :: Guns.com</p> <p>Images may be subject to copyright. Learn More</p> <p>Share</p> <p>radio egarforacke Davis P-32 Pistol Revie...</p> <p>DAVIS P32 NICKEL 32 ...</p> <p>model p 32 glock</p>
7:45 a.m.	Yes	
	Perfect	
12:22 p.m.		li
	How much that go for	
	And wassup with the switches [<i>i.e.</i> , a firearm accessory that	

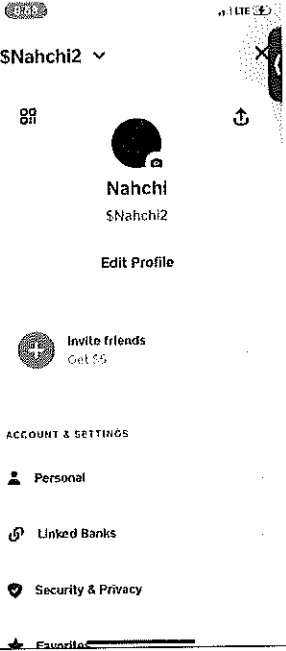

	turns a semi-automatic firearm into an automatic firearm] ?	
		Ima see wass wit the S [<i>i.e.</i> switch] Dat 1 want me 2 throw him 5
	5 for that little shit ?	
	Tssss	
	Nothing out there for \$350-\$400	
	I need switches . Guns with switches on [th]em	
		380s [<i>i.e.</i> , a type of firearm] b lower but ima put the wrd out bout the switches n lyk [<i>i.e.</i> , let you know]
	Grab 380s	
	N*****s got shells [<i>i.e.</i> , ammunition] those	
	We need multiple of those	
		Ii saydat
April 30, 2024		
...		
3:48 p.m.	The woks [<i>i.e.</i> , gang members] your age and younger at war with the hats [<i>i.e.</i> , a rival gang]	
	In Brooklyn	
	N*****s need wallets [<i>i.e.</i> , firearms]	
	When you coming up	
	Shit driving to cali	
4:23 p.m.		Hurd chu ... b back end of week

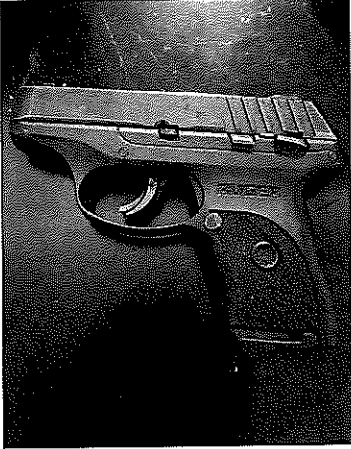
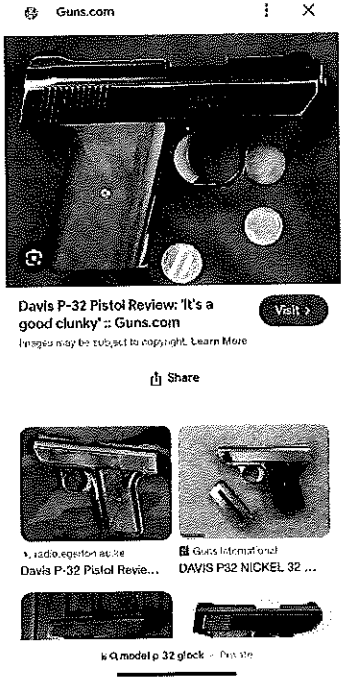
4:29 p.m.		How many need got 2 rn [<i>i.e.</i> , right now]
4:32 p.m.	Let me see [th]em	
4:37 p.m.		 <p>[sends a video of two handguns with loaded magazines]</p>
		N grey n brown fire pin shave down it clicked like switch [<i>i.e.</i> , a firearm accessory that turns a semi-automatic firearm into an automatic firearm]
4:49 p.m.	Perfect	
	They sexy bitches	
	How much ? I need deal	
	Can't afford to hear the hats scored [<i>i.e.</i> , the rivals shot a gang member] I wanna hear us doing the scoring	
5:10 p.m.		Dats a fact w'll chop it up #s [<i>i.e.</i> , we'll discuss prices] wok


d. On or about May 2 and May 3, 2024, COX and CC-1 again discussed CC-1's selling firearms to COX via Telegram:

Approximate Time	COX	CC-1
May 2, 2024		
8:57 p.m.	[COX sends CC-1 a voice message in which COX says, in substance and in part, "Bro, I'm buying them bro" and encourages CC-1 to stop talking about selling to another person]	
9:01 p.m.		O lght
9:03 p.m.		Wok was talkin bout he tryanna have me pass him off 1 wok
		But I'll b back 2mm
		N Condolences wok
9:08 p.m.	[COX sends CC-1 a voice message in which COX says, in substance and in part, that COX needs "one of them bad" and "needs to talk numbers"]	
9:11 p.m.		Ii Hurd ... I need 7 for the black one
9:12 p.m.	[COX sends CC-1 a voice message in which COX says, in substance in part, "You head crackin'. I need something for five."]	

9:13 p.m.		
	I can prolly give you half now	
	And half later	
	When I get back from Mexico	
9:14 p.m.		Bro sent me pic of this today I can grab it before tn [<i>i.e.</i> , tonight] n slide tmm [<i>i.e.</i> , tomorrow] I'll throw you this whatever # he says
		li
9:27 p.m.	[COX sends CC-1 a voice message in which COX says, in substance in part, "I need a number ASAP please bro please."]	
9:52 p.m.		Wit bro rn
		Want me 2 call wok

<p>10:01 p.m.</p>		 <p>[sends an image of a CashApp account]</p>
<p>10:03 p.m.</p>	<p>[voice call]</p>	
<p>11:08:49 p.m.</p>	 <p>How much</p>	

11:08:56 p.m.	 <p>How much</p>	
11:09:07 p.m.	 <p>How much</p>	
11:15 p.m.		[replying to the 11:09:07 p.m. message:] 8
		[replying to the 11:08:49 p.m. message:]65"
11:16 p.m.		650 for 380. 800 for one wit shaved fire pin. Waiting on bro 2

		find something smaller he wanted 550 for dat big shit
11:22 p.m.	Why you taxing for the little shit ?	
11:23 p.m.	<div></div> <p>650 for this ?</p>	
11:34 p.m.		Had a play lined on dat for one for 700 but I'll throw it to the family first but I ain't tryanna take L cuz it
11:51 p.m.	[voice call]	
May 3, 2024		
12:47 p.m.	[COX sends CC-1 a voice message in which COX, in substance in part, agrees to pay "550"; asks CC-1, "What time you gonna be up here today?"; asks CC-1, "You ready to spin [<i>i.e.</i> , shoot]?"; clarifies that COX just needs CC-1 "to be a driver" so that COX can "do a drill [<i>i.e.</i> , commit a shooting]"; explains that COX previously "shot up St. Nick"; and explains that COX expects fellow gang members to shoot rivals at particular locations	

	in Manhattan to avenge a gang killing]	
1:38 p.m.		Ait bet dats valid im on way rn be there tn n I'm wit it ... sayless

e. Between approximately June 26 and July 1, 2024, COX and CC-1 exchanged the following messages that appear to be COX asking CC-1 to bring him a firearm and then complaining about the firearm jamming:

Approximate Time	COX	CC-1
June 26, 2024		
5:14 p.m.	Yo the wallet [<i>i.e.</i> , firearm] still around ?	
	Got Don status for it	
5:28 p.m.		Got the one wit the s
		Saydat
June 27, 2024		
9:34 p.m.	Yooo	
9:53 p.m.		Yeeo ewee
9:59 p.m.	When can you bring that	
	I got the cash	
10:05 p.m.		Can slide to you in the am [<i>i.e.</i> , morning] if dat sturdy
10:14 p.m.	Yea facts	
10:18 p.m.		How much got for it ?
		N slide 2 x ?
10:20 p.m.	I got 4 rn [<i>i.e.</i> , right now] if anything I owe but I need it .	
	Just had a bang out [<i>i.e.</i> , a shootout with rivals] last night I'll	

	pyo [<i>i.e.</i> , put you on, or tell you about it] in person shit tact	
	And I'm leveling you up to[o] you heard as far as the line up [<i>i.e.</i> , the gang hierarchy] ...	
June 28, 2024		
7:41 a.m.	Yoo	
8:01 a.m.		Yeoo
	Pull up I'm here waiting	
		Saydat
9:27 a.m.	686 allerton ave	
	My number off I can't ft [<i>i.e.</i> , FaceTime]	
	Only text	
9:31 a.m.		Oo li
		In traffic on way
9:35 a.m.		Kopy in traffic on way
9:44 a.m.	Bet	
10:17 a.m.		Here
		You Hurd??
10:33 a.m.		Yooooooo
10:36 a.m.	Yoo	
	I'm in better shop	
	Barber shop	
	2716 White plains rd	

July 1, 2024		
9:50 a.m.	Yoo	
9:59 a.m.		Yeo
	Shit jammed first click [<i>i.e.</i> , first attempted fire]	

12. For the reasons that follow, I believe that CC-1 was trafficking firearms in interstate commerce from North Carolina to New York in furtherance of this conspiracy with COX, and that COX was located in Orange County, New York, for at least a portion of the conspiracy:

a. On or about April 10, 2024—about 11 days before CC-1 sent COX a video of the .32 Handgun later found in the Van in the Bronx—COX messaged CC-1, “But yo what part of North Carolina you in again ?” CC-1 replied, “Lmaoo say dat ... dat valid I’m in high point.”

b. The FBI has obtained historical cellsite data pursuant to a warrant for a particular phone number used by CC-1 (the “CC-1 Number”) to communicate with COX. I know based on the returns from that warrant, among other things, that from at least April 1 through at least May 2, 2024, the CC-1 Number regularly connected with cell towers in or near High Point, North Carolina. I further know that the CC-1 Number connected with several cell towers along major highways in Virginia, Pennsylvania, and New Jersey throughout the day on May 3, 2024—*i.e.*, the day that CC-1 told COX that CC-1 was “on [his] way rn [*i.e.*, right now]” after COX told CC-1 that COX wanted to take CC-1 on a “drill [*i.e.*, a shooting].” Based on my training and experience, I recognize the pattern of cellsite location data for the CC-1 Number on May 3, 2024, to be consistent with CC-1’s traveling by car or bus from North Carolina to the New York City area. Later on May 3, 2024, the CC-1 Number connected with cell towers in the vicinity of an address in Long Island, New York.

c. On or about April 21 and April 22, 2024, when COX was messaging CC-1 about acquiring, among other things, “[g]uns with switches on [th]em,” COX also messaged CC-1, “Call my 3477367503 number” (the “7503 Number”). The FBI has obtained historical cellsite data for the 7503 Number pursuant to a warrant. I know based on the returns from that warrant that the 7503 Number connected with cellphone towers in Orange County on or about April 21 and April 22.


COX’s July 8, 2024 Shooting

13. As described below, I believe that COX and CC-1 intended to use, possess, and carry the firearms trafficked to New York as part of this conspiracy in ways that would constitute a felony because, among other reasons, COX used the .32 Handgun to shoot at rival drug dealers in the Bronx on July 8, 2024.

14. Based upon my review of law enforcement reports and records and communications with other members of law enforcement, including from the NYPD, I know that, on or about July 8, 2024, shortly after 5 p.m., the NYPD received a 911 emergency call reporting, in substance and in part, that two gunshots were fired in the vicinity of White Plains Road and Allerton Avenue in the Bronx, New York, and that people were running towards a supermarket. NYPD officers canvassed the area of the reported shooting and did not locate any shell casings.

15. During the search of COX's Cellphones, I identified multiple communications between COX and two apparent narcotics co-conspirators ("CC-2" and "CC-3"). As described below, and in substance and in part, in his conversations with CC-2 and CC-3, COX admitted, in substance and in part, that he was the person who fired the reported gunshots at White Plains Road and Allerton Avenue shortly after 5 p.m. on July 8, 2024. COX further admitted that the gun he fired was a .32 caliber firearm matching the description of the .32 Handgun trafficked to New York by CC-1 at COX's request, and that he had shot at rival drug dealers because they had encroached on COX's territory and were undercutting his drug prices:

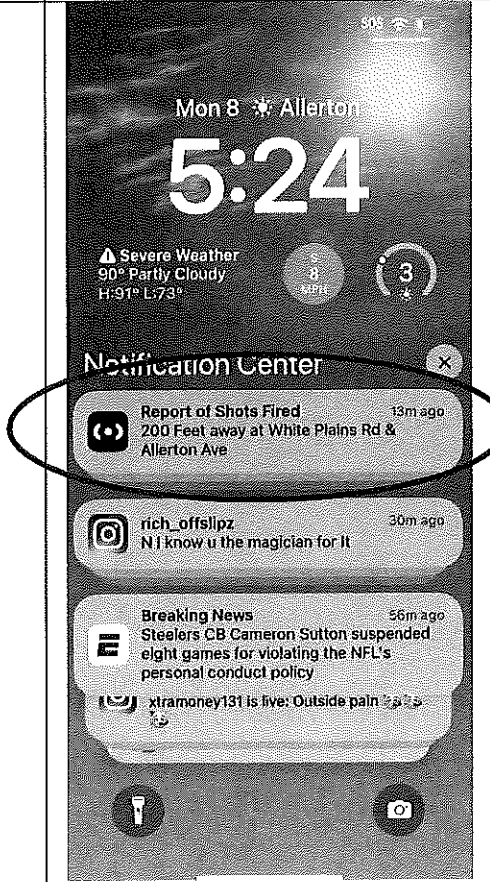
a. On or about July 8, 2024, COX and CC-2 discussed, via Telegram, a shooting COX had just committed that afternoon at rival drug dealers. COX began the discussion by sending CC-2 a screenshot of COX's phone displaying a notification from the Citizen phone application of a shooting in the Bronx that had been reported just after 5 p.m. and was "200 Feet away at White Plains Rd & Allerton Ave," which is the approximate time and location of the 911 report described above and the approximate location where COX was arrested in the Van on July 10, 2024:

Approximate Time	CC-2	COX
5:45 p.m.		 <p>Mon 8 Allerton</p> <p>5:44</p> <p>▲ Severe Weather 89° Mostly Cloudy H: 92° L: 73°</p> <p>3 8 MPH 2</p> <p>Notification Center</p> <p>Citizen</p> <p>Report of Person With Knife 4m ago 0.2 Miles away at 2443 Olinville Ave</p> <p>Report of Shots Fired 33m ago 200 Feet away at White Plains Rd & Allerton Ave</p> <p>Have You Seen Hilda? 38m ago The 72-year-old woman was last seen in Morris Park. Tap for a photo and description as police actively search your area.</p> <p>Overcrowding in this area and expect traffic delays.</p>

5:45 p.m.	Oh yall acting bad	
5:45 p.m.	Huh	
5:45 p.m.		Just blew n****s down
5:45 p.m.	SMH	
5:45 p.m.	Who	
5:46 p.m.		N****s backed out on us [<i>i.e.</i> , they pulled out firearms on us]
5:46 p.m.	Word	
5:46 p.m.		So I clicked [<i>i.e.</i> , So I shot]
5:46 p.m.	Word	
5:46 p.m.	As you should	
5:46 p.m.		Some n****s selling weed around the corner
5:46 p.m.	♂	
5:46 p.m.		They cutting our prices
5:46 p.m.	Gotta protect yours	
5:46 p.m.	Real shit	
5:46 p.m.		Facts

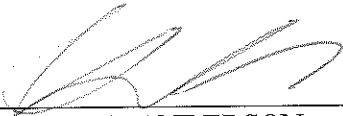
b. Around the same time, COX also discussed this shooting with CC-3 via Telegram. Based upon my review of their conversation, and in substance and in part, I know that (i) COX started this conversation by taking credit for the same Citizen notification that he sent to CC-2 roughly two minutes earlier and sent CC-3 a similar phone screenshot of the notification; (ii) COX admitted that he started shooting because other individuals were selling drugs in COX's corner ("Bro on the mb the n****s around the corner selling weed back out on us when we mobbed over there" [*i.e.*, others selling weed pulled out firearms on us ("back out on us")]); (iii) COX stated he used a .32 caliber firearm for the shooting but that firearm jammed after two shots ("I backed up and flicked on em this dumb ass 32 fucking jammed after 2 shots" [*i.e.*, I pulled out my firearm ("backed up") and shot at them ("flicked") but the firearm ("32") jammed after two shots]); and (iv) COX stated he contacted CC-1 about the .32 caliber firearm jamming and was going to obtain another firearm ("I just bombed [CC-1] for this shit he bout to give me another one" [*i.e.*, I just contacted CC-1 for another gun]).

c. Further, about 20 minutes before messaging CC-2 and CC-3 as described above, COX sent CC-1 messages similarly claiming credit for the same shooting, sending a screenshot of the same notification from the Citizen application and also telling CC-1 that the firearm COX used jammed after firing only two rounds:

Approximate Time	CC-1	COX
5:24 p.m.		
		Just flicked at and flicked back smh [<i>i.e.</i> , just got shot at and shot back]
		Told you wok [<i>i.e.</i> , gang members]
	Dammm smfh wok [<i>i.e.</i> , gang members]	
5:36 p.m.		Shit only let 2 [<i>i.e.</i> , only fired two shots]
	Wallet [<i>i.e.</i> , firearm] empty ?	

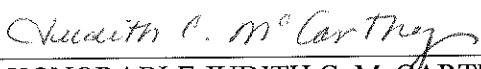
	Oo li kopy	
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WHEREFORE, I respectfully request that a warrant be issued for the arrest of KALIF COX, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



THOMAS L. ANDERSON
Special Agent
Federal Bureau of Investigation

Sworn to before me this 20th day of February, 2025.



THE HONORABLE JUDITH C. McCARTHY
United States Magistrate Judge
Southern District of New York